



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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M E M O R A N D U M

January 7, 1982

TO: David Nance, Plating Manager  
Universal Manufacturing Corporation

FROM: Julie Sellick *JS*

SUBJECT: Hazardous Waste and Water Quality Inspections on  
September 23, 1981

Mike Dawda and I conducted water quality and hazardous waste inspections, respectively, with you as our guide at the Woodinville Universal Manufacturing Corporation facility on September 23, 1981. Questions and concerns arose during those inspections regarding both water quality and hazardous waste handling at this facility. The purpose of this memo is to document and address those concerns.

During the hazardous waste inspection, I observed that incompatible wastes were not segregated at this facility. Drums of spent nitric acid were stored on the cement pavement near and slightly downhill from drums of spent chlorinated solvents with no safety precautions provided in case of spills or leaks. At the minimum, these drums should be stored on pallets to prevent them from coming in contact with ponded rainwater or spilled chemicals. The mixing of incompatible hazardous wastes should be avoided at all cost.

Commodity drums should also be segregated from hazardous waste drums. I noticed several instances where commodity drums were stored either near to, or actually within, a group of hazardous waste. The identity of the drums, whether commodity or hazardous waste, was not readily apparent because of improper labeling of the hazardous waste drums and accidental labeling of one of the commodity drums as "waste". Hazardous waste drums should be stored in a well-defined area and managed in such a way that the integration of commodity drums does not occur.

The proper labeling of hazardous waste drums is a necessary tool for effective and safe hazardous waste management, and is required by the Federal Resource Conservation and Recovery Act (RCRA) and by Washington State's Dangerous Waste Regulations. Most hazardous waste drums at your facility, however, lacked hazardous waste labels. Of those drums that were labeled, several had no dates of accumulation listed on the hazardous waste labels. Hazardous waste drums must be properly labeled with correct dates of accumulation listed on the labels at the time of filling of each drum. It was apparent to me that significant confusion regarding the contents of the hazardous waste drums resulted at this

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facility from the lack of proper drum labeling. Such violations of federal and state regulations are subject to citations or enforcement action by the U.S. Environmental Protection Agency (EPA) or by the Washington State Department of Ecology (WDOE).

Hazardous waste drums must also be closed and tightly bunged after filling and during storage. This requirement is also set forth under RCRA and Washington State's Dangerous Regulations, and as such, is enforceable by EPA and/or WDOE. During the inspection, however, I noticed several full or partially full hazardous waste drums or containers which lacked either bungs in their lids or lids. Hazardous waste spills and mixing could easily result from this kind of handling.

If drum labeling and/or drum sealing violations continue at your facility, fines will be levied.

In order to prevent any adverse effects on state waters, chemicals shall be stored in a manner such as to prevent their entry into the waters of the state. This would require chemicals and waste chemicals to be stored in diked areas with no outlet. The waste chemical containers shall be tightly closed and stored in an upright position. Also, chemicals shall be dispensed only in roofed and bermed areas to eliminate potential spills into state ground or surface waters.

We will be arranging another inspection of your facility in the near future and would like to see that the aforementioned improvements are completed at the facility soon. If you have any questions regarding this matter, do not hesitate to call Mike Dawda or me at this office.

JS:MMD:mk